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March 8, 2023

VIA E-MAIL

Hon. Mary Kay Vyskocil
United States District Court
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 2230
New York, NY 10007

Re: *All Glass S.R.L. v. Arglass Yamamura SE, LLC*, Civil Action No.: 22-cv-07863 (MKV)
Settlement Update and Request for Extension of Discovery

Dear Judge Vyskocil:

Plaintiff-Counterclaim Defendant All Glass S.R.L. and Defendant-Counterclaim Plaintiff Arglass Yamamura SE, LLC (collectively, the “Parties”) hereby jointly write to inform the Court that the Parties have agreed on settlement terms, subject to documentation. The Parties anticipate finalizing a settlement agreement in early April.

In order to allow sufficient time to negotiate this settlement agreement and preserve the Parties’ ability to conduct discovery if settlement is not agreed upon, the Parties respectfully request that this Court extend the Parties’ outstanding discovery deadlines by one month. All future discovery deadlines and the Parties’ proposed new deadlines are detailed in the chart below.

Task	Current Deadline	Proposed Deadline
Service of expert witness disclosures.	March 24	April 24
Completion of all fact discovery and depositions.	March 30	May 1
Exchange of expert witness reports.	April 28	May 30
Production of any documents underlying expert witness reports to the extent not already produced.	May 5	June 5
Exchange of expert witness rebuttal reports.	May 19	June 20
Completion of expert witness discovery and depositions.	May 29	June 29

There have been no previous requests for extensions of any discovery deadlines in this case, and the Parties have met all discovery deadlines to date.

Sincerely,

/s/ Gary Mennitt
Gary Mennitt

CC: Counsel of record via ECF